

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES ET AL	*	
	*	CASE NO. 3:23-CV-571
	*	
VERSUS	*	CHIEF JUDGE TERRY A. DOUGHTY
	*	
ALEX STAMOS ET AL	*	MAG. JUDGE KAYLA D. MCCLUSKY
	*	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS**

NOW INTO COURT, through undersigned counsel, come Defendants Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, Leland Stanford Junior University, Kate Starbird, Graphika, Atlantic Council, and Graham Brookie (“Defendants”), who respectfully move for an extension of time—until July 14, 2023—to respond to the Complaint [Doc. No. 1] filed by Plaintiffs Jill Hines and Jim Hoft (“Plaintiffs”).¹ In support, Defendants represent as follows:

1. Plaintiffs filed the Complaint on May 2, 2023.

¹ The Complaint names Camille François as a defendant, but Ms. François has not been served with the Complaint and Summons.

Plaintiffs also purported to name the Stanford Internet Observatory and the Atlantic Council's Digital Forensic Research Lab as defendants. The Stanford Internet Observatory is a Stanford program, not an independent legal entity that can sue or be sued, and it has not been properly served and is not a proper defendant. Likewise, the Digital Forensic Research Lab is an Atlantic Council program, not an independent legal entity that can sue or be sued, and it has not been properly served and is not a proper defendant. Defendants Leland Stanford Junior University and Atlantic Council intend to meet and confer with Plaintiffs as to this issue and will address it in an appropriate motion if necessary after meeting and conferring. To the extent a response to the complaint is due from Stanford Internet Observatory or the Digital Forensic Research Lab, the deadline should be July 14, 2023, as well.

2. Defendant Atlantic Council was served with the Complaint and Summons on May 12, 2023, and its answer is currently due June 2, 2023;

3. Defendant Graham Brookie was served with the Complaint and Summons on May 15, 2023, and his answer is currently due June 5, 2023;

4. Defendant Renée DiResta was served with the Complaint and Summons on May 10, 2023, and her answer is currently due May 31, 2023;

5. Defendant Graphika was served with the Complaint and Summons on May 10, 2023, and its answer is currently due May 31, 2023;

6. Defendant Leland Stanford Junior University was served with the Complaint and Summons on May 10, 2023, and its answer is currently due May 31, 2023;

7. Defendant Board of Trustees Leland Stanford Junior University was served with the Complaint and Summons on May 10, 2023, and its answer is currently due May 31, 2023;

8. Defendant Alex Stamos was served with the Complaint and Summons on May 10, 2023, and his answer is currently due May 31, 2023; and

9. Defendant Kate Starbird was served with the Complaint and Summons in her official capacity on May 12, 2023, and in her individual capacity on May 30, 2023.

10. The Complaint presents numerous questions of federal, state, and constitutional law and involves numerous, separately represented Defendants.

11. The requested extension of time will enable Defendants to coordinate their response to the Complaint to eliminate redundancy and serve judicial efficiency.

12. Counsel for Defendants have conferred with counsel for Plaintiffs, and Plaintiffs do not oppose granting an extension of time for Defendants to respond to the Complaint to July 14, 2023.²

WHEREFORE, Defendants request that the Court grant this motion and enter an order extending the deadline for Defendants to respond to the Complaint to July 14, 2023.

Respectfully submitted,

/s/ Devin Reid

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² Pursuant to Western District of Louisiana Local Rule 7.9, attached to this motion is a certificate by undersigned counsel that consent was sought for the extension requested herein and there is no opposition to the extension sought by this motion.

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*Counsel for Kate Starbird, in her official and
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of May, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and I further certify that, on the same day, I mailed, faxed, or e-mailed the foregoing document with exhibits and notice of electronic filing to the attorneys for all parties.

s/ Devin C. Reid

Devin C. Reid